

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE, LUKE LOE, RICHARD ROE, and MARY :  
MOE, individually and on behalf of all others similarly :  
situated, :  
: *Plaintiffs*, :  
: No. 1:18-cv-09936 (LGS)  
v. :  
: THE TRUMP CORPORATION, DONALD J. TRUMP, in :  
his personal capacity, DONALD TRUMP JR., ERIC :  
TRUMP, and IVANKA TRUMP, :  
: *Defendants*. :  
:-----X

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Affirmation of Cynthia Chen, together with its exhibits, Defendants The Trump Corporation, Donald J. Trump, in his personal capacity, Donald Trump Jr., Eric Trump, and Ivanka Trump will move this Court, before the Honorable Lorna G. Schofield, United States District Judge for the Southern District of New York, on a date and time to be set by the Court, for an order (1) dismissing the Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, for failure to state a claim upon which relief can be granted, and (2) dismissing counts three through eight of the Complaint pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, on the additional ground that lack of subject-matter jurisdiction is lacking under Title 28, United States Code, Sections 1332(a) and 1332(d)(2). The bases for the motion are set forth in the accompanying Memorandum of Law.

Dated: January 14, 2019  
New York, New York

Respectfully submitted,

SPEARS & IMES LLP  
/s/ Joanna C. Hendon  
Joanna C. Hendon  
Cynthia Chen  
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Corporation, Donald J. Trump, in his  
personal capacity, Donald Trump, Jr., Eric  
Trump, and Ivanka Trump*